

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

DGCI CORPORATION,

Plaintiff,

v.

**TRIPLE ARROW COMPANY FOR
GENERAL TRADING CO. LTD.,**

Defendant.

No.: 21-CV-1174

**DECLARATION OF ROBERT H. BELL IN SUPPORT OF
DGCI'S MOTION FOR A TEMPORARY RESTRAINING ORDER**

ROBERT H. BELL, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury as follows:

1. I am an attorney with Peckar & Abramson, P.C., attorneys for DGCI Corporation ("DGCI") in the above-captioned case. I am a member in good standing of the New York Bar. I have been granted admission *pro hac vice* in this Court for this matter.
2. I submit this Declaration in support of DGCI's Motion for a Temporary Restraining Order. Unless stated otherwise, I have personal knowledge of the facts stated herein.
3. I was a recipient of email correspondence from Mr. Sami Sultan, Iraqi legal counsel for Triple Arrow Company for General Trading Co. Ltd. ("Triple Arrow"), sent from email address sami.sultan@triplearrow.com, in this matter, on September 27, 2021.
4. I caused pleadings related to DGCI's Motion for a Temporary Restraining Order to be sent via email to Mr. Sultan at the same email address, sami.sultan@triplearrow.com, as follows.

5. Attached hereto as Exhibit A is a true and correct copy of the transmittal email I caused to be sent to Mr. Sultan at sami.sultan@triplearrow.com on October 19, 2021 with file-stamped copies of the following:

- Complaint [Dkt. No. 1] and Proposed Summons [Dkt. No. 6]; and
- Motion for Temporary Restraining Order with attached Memorandum of Law in Support, Declaration with Exhibits, FRCP 65(b)(1) Certification and Proposed Order [Dkt. No. 5].

6. Attached hereto as Exhibit B is a true and correct copy of the transmittal email I caused to be sent to Mr. Sultan at sami.sultan@triplearrow.com on October 20, 2021 with file-stamped copies of the following:

- Complaint [Dkt. No. 1] and Summons [Dkt. No. 7];
- Motion for Temporary Restraining Order with Proposed Order [Dkt. No. 11];
- FRCP 65(b)(1) Certification [Dkt No. 12]
- Motion for Preliminary Injunction with Proposed Order [Dkt. No. 13]
- Memorandum of Law in Support of Motions [Dkt. No. 14]
- Declaration with Exhibits in Support of Motion (parts 1-3 of 5, due to size of file) [Dkt No. 15]

7. Attached hereto as Exhibit C is a true and correct copy of the transmittal email I caused to be sent to Mr. Sultan at sami.sultan@triplearrow.com on October 20, 2021 with file-stamped copies of the following:


- Continued Exhibits in Support of Motion (parts 4-5 of 5, due to size of file) [Dkt No. 15]

8. Attached hereto as Exhibit D is a true and correct copy of the transmittal email I caused to be sent to Mr. Sultan at sami.sultan@triplearrow.com on October 23, 2021 with file-stamped copies of the following:

- Notice of Hearing for Motion for Temporary Restraining Order [Dkt. 20]; and
- Notice of Hearing for Motion for Preliminary Injunction [Dkt. 19].

Dated: October 25, 2021

Respectfully submitted,


Robert H. Bell